



December 8, 2023

Norton Rose Fulbright US LLP
1301 Avenue of the Americas
New York, New York 10019-6022
United States of America

VIA ECF

Direct line +1 212 318 3363
joe.hughes@nortonrosefulbright.com

Tel +1 212 318 3000
Fax +1 212 318 3400

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1105
New York, NY 10007

Re: *Sykes et al. v. TSG Interactive US Services Limited d/b/a PokerStars*, No. 1:23-cv-7210-JMF (S.D.N.Y.) – MDL Transfer Notice

Dear Judge Furman:

We represent Defendant TSG Interactive US Services Ltd. d/b/a PokerStars (“TSG”) in the above-referenced matter. We write to inform the Court that this case has been noticed for transfer by TSG into the *In re: MoveIT Customer Data Security Breach Litigation*, No. 23-md-3083, multidistrict litigation (“MDL”) currently pending before Judge Allison D. Burroughs in the United States District Court for the District of Massachusetts. Counsel for TSG conferred with counsel for Plaintiffs who agree to the notice of transfer and to stay all deadlines pending transfer into the MDL, as requested below.

A Notice of Potential Tag-Along Action was filed by TSG on December 8, 2023, attached hereto as Exhibit 1, pursuant to Judicial Panel on Multidistrict Litigation’s (“JPML”) rule 7.1(a). Accordingly, pursuant to JPML procedure, the Clerk of the Panel will issue a Conditional Transfer Order (“CTO”), and will then transfer within seven (7) days thereafter given Plaintiffs’ agreement to the transfer.

In light of the foregoing, TSG, with agreement from Plaintiffs’ counsel, respectfully requests that the Court stay all deadlines in this action pending transfer into the MDL. This is in accordance with Judge Burrough’s Order in the MDL docket staying all responsive deadlines in all cases pending in the MDL. (No. 23-md-3038, ECF No. 11.)

We thank the Court for its consideration of this request.

Respectfully Submitted,

/s/ Joseph Hughes
Joseph Hughes

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 28.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Allison D. Burroughs', written over a blue horizontal line.

cc: All Counsel of Record (via ECF)

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

December 8, 2023

Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at nortonrosefulbright.com.